IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Brigitte Quinn, Plaintiff, vs. Coventry Health Care of the Carolinas, Defendant.	Case No. 7:16-cv-03171-MGL **NOTICE OF REMOVAL**

YOU WILL PLEASE TAKE NOTICE that Coventry Health Care of the Carolinas ("Defendant"), in the above captioned action, hereby removes the above-captioned case into the United States District Court for the District of South Carolina, Spartanburg Division. This removal is proper on the following grounds:

1. The above action was brought in the Court of Common Pleas, County of Spartanburg, State of South Carolina, by the Plaintiff, Brigitte Quinn ("Plaintiff"), with the filing of a Summons and Complaint on August 2, 2016. The South Carolina Department of Insurance accepted service of the Summons and Complaint on behalf of Defendant on August 23, 2016. (State Court Pleadings and Affidavit of Service are attached hereto as Exhibits "A" & "B").

2. A Notice of Removal is being filed, pursuant to 28 U.S.C. § 1446(b)(3), within thirty (30) days of the receipt by Defendant of notice from which it may be ascertained that the case is one that is or has become removable.

3. Defendant is a foreign corporation incorporated outside the State of South Carolina and with its principal place of business outside the State of South Carolina.

4. Upon information and belief, Plaintiff is a citizen of South Carolina, a state different from Defendant's state of incorporation or principal place of business.

6. Upon information and belief, and based on a fair reading of the substantive allegations, the amount in controversy and sought by the Plaintiff exceeds $75,000.00, exclusive of interest and costs.

7. A copy of this Notice of Removal has been filed with the Clerk of Court for the Spartanburg County Court of Common Pleas.

8. Defendant specifically reserves and does not waive any defenses it may have.

9. Defendant has simultaneously served herewith its Responses to Local Rule 26.01 Interrogatories.

10. Defendant has simultaneously served herewith its Answer to Plaintiff's Complaint.

WHEREFORE, the Defendant hereby gives notice that the aforesaid action is removed from the Circuit Court for Spartanburg County, South Carolina, into this Court for trial and determination.

[SIGNATURE ON FOLLOWING PAGE]

s/Bradish J. Waring

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Attorneys for Defendant

September 20, 2016
Charleston, South Carolina